

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate Commission
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Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**NEWSPAPER ASSOCIATION OF AMERICA
REQUEST FOR ORAL CROSS-EXAMINATION AND
DESIGNATION OF WRITTEN CROSS-EXAMINATION OF
UNITED STATES POSTAL SERVICE WITNESS JAMES M. KIEFER
(USPS-T-36)
August 3, 2006**

The Newspaper Association of America ("NAA") hereby requests oral cross-examination of United States Postal Service witness James M. Kiefer (USPS-T-36).

NAA hereby designates the following interrogatory responses as its written cross-examination of) witness Kiefer (USPS-T-36):

NAA/USPS-T36: 1, 3-19
AAPS/USPS-T36: 1, 2, 6, 8
VP/USPS-T36: 4, 5, 7, 13, 20
VP/USPS-T23 (redirected): 2
POIR No. 5: 3

The oral cross-examination will focus on the issues in the designated interrogatories regarding rate design for Standard Enhanced Carrier Route mail.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants requesting such service in this proceeding in accordance with section 12 of the Rules of Practice.

August 3, 2006

William B. Baker

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